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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

CASE NO. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF PLAINTIFFS' MOTION
TO CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 6-3 in support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (the “Motion to Consider”).

2. The Motion to Consider is filed in connection with Plaintiffs’ Motion to Amend Case Management Schedule (the “Scheduling Motion”).

3. The Scheduling Motion and the Declaration of Maxwell V. Pritt in Support of Plaintiffs’ Motion to Amend Case Management Schedule (the “Scheduling Motion Declaration”) contain, in various places, summaries or descriptions of material that Defendant Meta Platforms, Inc., has designated as “Confidential” or “Attorneys Eyes Only,” as defined in the in the parties’ Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the “Protective Order”).

4. The Protective Order expressly applies to “any information copied or extracted from Protected Material” and “summaries” of Protected Material. ECF No. 90 at 3-4.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of September 2024 in San Francisco, California.

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt